## UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

	X	
In re:	:	Chapter 11
	:	
BIG LOTS, INC., et al., <sup>1</sup>	:	Case No: 24-11967 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
		Re: D.I. No. 683, 454, 16
	X	,

## OBJECTION OF LANDLORD COLUMBIA PARK RETAIL OWNER, LLC TO NOTICE OF POTENTIAL ASSUMPTION OF EXECUTORY CONTRACTS, UNEXPIRED LEASES AND CURE AMOUNTS

Columbia Park Retail Owner, LLC, as successor-in-interest to FC/TREECO Columbia
Park, LLC c/o Madison International Realty as the landlord ("Landlord") of Store No. 5323
located at 3129 Kennedy Blvd, North Bergen, New Jersey 07047 (the "Premises") under lease
(the "Lease") with the above-captioned Debtor, by and through its undersigned counsel, files this
objection to the Notice Of Potential Assumption of Executory Contracts, Unexpired Leases and
Cure Amounts [D.I. No. 683] and restates its objection [D.I. No. 454] to Motion for Entry of
Final Order (I) Authorizing Debtors to Assume the Services Agreement, (II) Authorizing Store
Closing Sales and Approving Related Procedures, and (III) Granting Related Relief [D.I. No.
16] and in support thereof states as follows.

4900 E. DublinGranville Road, Columbus, OH 43081.

<sup>&</sup>lt;sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is

Currently, the cure amount owed under the Lease totals no less than approximately \$146,924.15, comprised of \$88,424.85 Base Rent, \$24,363.90 CAM and \$34,135.38 RET. Landlord reserves all rights to amend or supplement this objection as well as any additional grounds for objection to the proposed assumption and assignment.

Dated: Wilmington, Delaware November 5, 2024

/s/Michael J. Joyce
Michael J. Joyce (No. 4563)

JOYCE, LLC
1225 King Street, Suite 800
Wilmington, DE 19801
(302)-388-1944
mjoyce@mjlawoffices.com

-and-

Andrew R. Gottesman, Esq. **ROSENBERG & ESTIS, P.C.** 733 Third Avenue
New York, New York 10017
Tel: (212) 551-1273
agottesman@rosenbergestis.com

Counsel to Columbia Park Retail Owner, LLC, as successorin-interest to FC/TREECO Columbia Park, LLC c/o Madison International Realty as the landlord